

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Liberty Property Holdings SC, LLC
individually, derivatively on behalf of
Renaissance Tower Horizontal Property
Regime, and on behalf of a class of all others
similarly situated; Azure Bleu, LLC; Edelyne
Beauvais-Thomas; Jason E. Blosser; Nicole
M. Blosser; Eshellah D. Calhoun; Zachary G.
Calhoun; David DiMaio; Linda DiMaio;
Susan H. Ferguson; Four Parts Whole, LLC;
Sharon M. Hubbard; Carol A. Messenger;
Jeffrey S. Palmer; Summalin, Inc.; Terry J.
Tuminello; Shelley Ware; and Jonathan S.
Williams,

Plaintiffs,

v.

Jeffrey L. Richardson; William S. Spears;
Brent M. Whitesell; Laurie Z. Wunderley;
Madeline R. Mercer; Catherine M. Gregor;
Dennis J. Sassa; Tracy A. Meadows; Peter A.
Grusauskas; and William Douglas
Management, Inc.,

Defendants.

CIVIL ACTION NO.: 4:22-cv-03556-RBH

**PLAINTIFFS' MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSE TO DEFENDANTS'
MOTION TO DISMISS**

Plaintiffs Liberty Property Holdings SC, LLC; Azure Bleu, LLC; Edelyne Beauvais-Thomas; Jason E. Blosser; Nicole M. Blosser; Eshellah D. Calhoun; Zachary G. Calhoun; David DiMaio; Linda DiMaio; Susan H. Ferguson; Four Parts Whole, LLC; Sharon M. Hubbard; Carol A. Messenger; Jeffrey S. Palmer; Summalin, Inc.; Terry J. Tuminello; Shelley Ware; and Jonathan S. Williams, (all plaintiffs together, "Plaintiffs"), by and through their undersigned counsel, respectfully move this Court for an Order extending the time for Plaintiffs to file a response to

Defendants' Motion to Dismiss to January 26, 2023. Defendants' Motion to Dismiss was filed on December 13, 2022, and Plaintiffs' response is currently due on December 28, 2022.

The current deadline for Plaintiffs' response falls in the middle of the Christmas and New Year holidays. Additionally, Plaintiffs' counsel has been and will continue to be occupied with a brief due to the South Carolina Court of Appeals on January 3, 2023, a brief due to Judge Norton of the United States District Court for the District of South Carolina on January 6, 2023; and trial preparations for a case currently set as the first case on the January 9, 2023 trial roster for the Dorchester County Court of Common Pleas.

The undersigned sought and obtained consent to the proposed extension from all parties. Plaintiffs have not previously been granted an extension of the deadline to file its response. This motion is made in good faith and not for the purpose of unnecessary delay.

WHEREFORE, Plaintiffs respectfully move the Court for an Order extending the deadline for Plaintiffs to file their response to Defendants' Motion to Dismiss to January 26, 2023.

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